

As Prepared for Delivery
Comments of Mariela Ruacho
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On
The U.S. Environmental Protection Agency
California Commercial Harbor Craft Waiver
Docket ID No. EPA-HQ-OAR-2023-0153
June 1, 2023

Hello, my name is Mariela Ruacho, I am the Clean Air Advocacy Manager for the American Lung Association in California. I urge you to approve the California waiver for the commercial harbor craft rule.

Our 2023 State of the Air report found that 98 percent of Californians live with the most polluted air in the United States with California cities dominating the top 10 lists for all three pollution categories. Our report focuses on unhealthy ozone pollution days, particle pollution days, and annual particle pollution levels.

These pollutants are directly connected to commercial harbor craft vessels, which generate significant levels of pollution both inland and in communities near harbors.

Low-income communities and communities of color face more negative health impacts, including portside communities directly impacted by harbor craft vessels.

The amended rule covers a range of harbor craft vessels that represent a major source of local and regional health risks such as tugboats, ferries, fishing boats and other harbor craft vessels and emission reductions must be addressed as quickly and thoroughly as possible.

The updated rule is set to put more stringent emissions control strategies to improve air quality by accelerating the move to zero-emission options where feasible and cleaner tier 3 and 4 engines on all other vessels. Harbor craft vessel emissions are a significant source of smog-forming NOx emissions and fine particle pollution. One sportfishing boat produces the equivalent exhaust of 162 diesel school buses according to the California Air Resources Board. The harbor craft sector represents one of the top three sources of cancer risks in seaport communities and contributes to California communities failing to achieve health-protective air quality standards.

When implemented the rule is expected to result in 89 percent reduction of diesel particle pollution and a 54 percent reduction in NOx by 2035. The rule will result in an estimated \$5.25 billion in public health benefits between 2023 and 2038, and avoid:

- 531 premature deaths
- 161 hospital admissions
- 236 emergency room visits

Also, the rule will reduce cancer risk to over 22 million residents who live near the coast and up to 50 miles inland.

We need to move off-road equipment and vessels to zero-emission and away from combustion engines to improve lung health and for California to meet clean air standards.

I urge EPA to approve the commercial harbor craft rule to improve community and regional health. Thank you.